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July 29, 2014

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VIA ELECTRONIC FILING

Ms. Jocelyn Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**Re: Application of CUC, Inc. for Adjustment of Rates and Charges
Docket No. 2013-451-WS**

Dear Ms. Boyd:

As required by R. 103-833 of the Commission's Rules of Practice and Procedure, we are filing copies of discovery requests that we served today on Applicant CUC, Inc. in the captioned proceeding.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/tch
Enclosures

cc: Steven G. Mikell, Esquire (via email and US Mail)
Shannon Bowyer Hudson, Esquire (via email and US Mail)
Andrew M. Bateman, Esquire (via email and US Mail)
Mr. Patrick Parkinson (via email)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2013-451-WS

In Re:)	
)	
)	
Application of CUC, Incorporated for)	FIRST INTERROGATORIES AND
Adjustment of Rates and Charges)	REQUESTS FOR DOCUMENTS OF
)	CALLAWASSIE ISLAND
)	PROPERTY OWNERS
)	ASSOCIATION

TO: Steven G. Mikell, Esquire, attorney for CUC, Inc.:

Callawassie Island Property Owners Association ("CIPOA") hereby requests that CUC, Inc. ("CUC"), no later than twenty (20) days after service hereof, answer the following interrogatories and produce the following documents in accordance with South Carolina Public Service Commission Rule 103-833. These requests shall be deemed to continue until the time of the hearing of the case.

Requests for Documents.

1. Produce copies of all documents provided by CUC to the Office of Regulatory Staff in connection with this matter.
2. Produce the most recent monthly premium statement for the health insurance coverages provided by CUC to its employees. The documents requested are those that would show the basis for the expenses charged to Accounts 604.2 and 704.2 on the CUC Proforma Income and Expense Statement (Exhibit D to the Application).

Interrogatories.

1. List any companies with which CUC is affiliated, including any companies in which the principals of CUC, Billy F. Burnett and Susan B. Mikell, have any ownership interest.
2. List all employees of CUC. For each such employee provide the salary and title of the employee, a description of the duties of the employee and the principal location where the employee performs those duties.
3. List any CUC employees who are also employed by other entities and provide the percentage of time any such employee spends working for entities other than CUC.

Dated this 29th day of July, 2014.

ROBINSON, MCFADDEN & MOORE, P.C.



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Counsel for Callawassie Island Property
Owners Association

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2013-451-WS**

In Re:

Application of CUC, Incorporated for
Adjustment of Rates and Charges

CERTIFICATE OF SERVICE

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This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **First Interrogatories and Requests for Documents of Callawassie Island Property Owners Association** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Steven G. Mikell, Esquire
Mikell Law Firm
310 West Pine Street
Florence, South Carolina 29501

Shannon B. Hudson, Esquire
Andrew M. Bateman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29202

Dated at Columbia, South Carolina this 29th day of July, 2014.



Toni C. Hawkins